

**Remarks/Argument**

Reconsideration of this application is requested.

**Claim Status**

Claims 23-28 and 31-38 are pending. Claims 1-22 and 29-30 are canceled without prejudice. Since no claims are added, amended or canceled, no listing of claims is required under 37 CFR 1.121.

**Claim Rejections – 35 USC 103(a)**

Claims 23-28 and 31-38 are rejected under 35 USC 103(a) as obvious by Taguchi (US RE33,740) in view of Landmeier (US 5,381,160). In response, applicant traverses the rejections and asserts that independent claim 23 is patentable over the applied references. In particular, claim 23 recites:

*“... the said induction layer is the antenna array printed on the insulation membrane and arranged along the X, Y axes,” and*

*“...said insulation membrane is made by film material,” and*

*“...said induction layer consists of two or more layers, and the induction cells on respective induction layers are set to interlace with each other.”*

As a threshold hold issue, claim 23 requires antenna array printed on the insulation membrane as the induction layer, and Taguchi fails to teach or suggest that limitation. Taguchi at col. 6, lines 11-35 teaches that the conductor sheets 130b and 130b, identified by the Action as corresponding to the induction layer, are etched printed boards. Applicant suggests that the etched printed board does not correspond to an antenna array printed on the insulation membrane structurally. Thus Taguchi does not teach or suggest the required induction layer.

Moreover, the Applicant disagrees with the Action's assertion that Taguchi's detecting lines 150 and exciting lines 160 and conductor sheets 130b and 130d correspond to the induction layer of claim 35 (Taguchi FIG. 2). As shown in FIG. 2 of Taguchi, lines 150 are detecting lines etched out of the conductor sheet 130, and they are not disposed on the conductor sheet. Concerning lines 150 and 160, Taguchi in last paragraph of col. 6 states: "the exciting lines 160a to 160i are connected in series" and "The other or second end of the exciting line 160a and that of the exciting line 160i are connected to the driving current source 200." Thus, lines 150 and 160 do not form the required antenna array and the induction cell and do not performed the required induction function.

Concerning conductor sheets 130b and 130d, applicant suggests that those sheets are not arranged along the X, Y axes so as to form induction cells, as asserted by the Action. However, as shown in FIG. 2 of Taguchi, the conductor sheets 130b and 130d are both arranged along the Y axe instead of along the X and Y axes. Thus, the conductor sheets 130b and 130d cannot correspond to the required induction cells or arrays.

Furthermore, applicant suggests that Taguchi is directed at a different technology, and cannot form the required induction layer that is "the antenna array printed on the insulation membrane and arranged along the X, Y axes" required by claim 23. In particular, Taguchi teaches a detection unit having conductor sheets 130 each having detecting lines 150 or exciting lines 160 arranged in a single direction. A magnetic sheet 120 is required between the conductor sheets 130. Referring to the second paragraph of Taguchi, col. 5, Taguchi states "The tablet 100 is composed of twelve layers which are respectively constituted by a shielding sheets 110a magnetic sheets 120a, 120b, conductor sheets 130a, 13Gb, magnetic sheets 120c, 120d, conductor sheets 130c, 130d, magnetic sheets 120e, 120f, and a

shielding sheet 110b, these layers being disposed in that order from the upper side to the lower side thereof.” Further referring to the last paragraph of Taguchi, col. 8, Taguchi states “the magnetic sheet 120b, the conductor sheet 130b, the magnetic sheet 120d, the conductor sheet 130d and the magnetic sheet 120e are laid one upon the other in the mentioned order to thereby constituted an X-direction position detecting unit, while the magnetic sheet 120a, the conductor sheet 130a, the magnetic sheet 120c, the conductor sheet 130c and the magnetic sheet 120e are laid one upon the other in the mentioned order to thereby constitute a Y-direction. position detecting unit ...”

As seen in the disclosure cited above, the Taguchi position detecting unit in is formed by multiple layers, including at least two conductor sheets 130 sandwich a magnetic sheet 120. In contrast, claim 23 requires each induction layer is provided with antenna array arranged along both the X and Y axes, and each area enclosed by each lattice unit constitutes one induction cell. Thus, Taguchi’s detection unit cannot read on the requirements of claim 23.

Concerning the limitation “...said induction layer consists of two or more layers, and the induction cells on respective induction layers are set to interlace with each other” of claim 23, the Action apparent asserts that the lines 150 on sheet 130b in FIG. 2 of Taguchi constitute one induction. layer, lines 160 on sheet 130d constitute a second induction, layer, and the induction cells on respective induction layers are set to interlace each other. However, as explained before, lines 150 and 160 are detecting lines and exciting lines respectively, and they do not form an induction layer with sheets 130b and 130d.

Moreover, as mentioned above, referring to the last paragraph of Taguchi, col. 8, sheets 120b, 130b, 120d, 130d and 120f are laid one upon the other to thereby constituted an X-direction position detecting unit, and sheets 120a, 130a, 120c, 130c

and 120e are laid one upon the other to thereby constituted an Y-direction position detecting unit. Accordingly, only by laying all these layers together can one detect both X and Y directions. However, this function is achieved simply by only one induction layer of claim 23, without the combination of multiple layers. Based on the structure that each induction layer is provided with induction cells, the two or more layers in claim 23 is aimed at interlacing induction cells on different layers so as to further improve accuracy of induction (see paragraph [0045] of the present application). Therefore, Taguchi does not teach or suggest those limitations of claim 23.

Landmeier is directed to a direction detection unit utilizing grids of parallel transparent conductors (Abstract), and does not teach suggest limitations relate to induction layers. Thus, Landmeier cannot remedy the deficiencies of Taguchi.

Accordingly, since Taguchi and Landmeier do not disclose each and every limitations of claim 23, those applied references cannot obviate claim 23, or claims 24-28 and 31-38 dependent therefrom. The rejections of claims 23-28 and 31-38 under 35 USC 103(a) should therefore be withdrawn.

### **Conclusion**

This application is now in condition for allowance. The Examiner is invited to contact the undersigned to resolve any issues that remain after consideration and entry of this amendment. Any fees due with this response may be charged to our Deposit Account No. 50-1314.

Appl. No. 10/500,438

Amdt. Dated May 20, 2009

Reply to Office Action of February 20, 2009

Attorney Docket No. 88538.0002

Customer No.: 26021

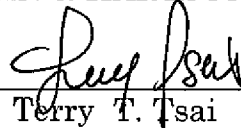
If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

Date: May 20, 2009

By: \_\_\_\_\_



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